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*Acting Director*

June 23, 2025

IT IS SO ORDERED  
this 9th day of July 2025

Hon. Justin T. Quinn, U.S.M.J.

**Via CM/ECF**

Honorable Justin T. Quinn, U.S.M.J.  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: Ron Doe v. Richard Burnadz, et al.,  
Civil Action No.: 3:25-cv-01976 (ZNQ-JTQ)

Dear Judge Quinn:

I represent Defendants, Colonel Patrick J. Callahan and New Jersey State Troopers Richard Burnadz, Colon Gano and Nicholas Parisi ("Defendants"), in the above-entitled matter. I write to respectfully request a 30-day extension of the deadline for the Defendants to respond to the Complaint.

On May 5, 2025, the Defendants executed waivers of service, which made their answers due June 23, 2025. On June 16, 2025, the Court conducted a telephone status conference, wherein the undersigned counsel informed the Court of an ongoing criminal investigation related to the civil case and the need for additional time to respond.

With Plaintiff's consent, I respectfully request a 30-day extension to July 23, 2025, in which to respond to the Complaint. An extension would permit additional time to consult with the Division of Criminal Justice and/or appropriate individuals involved in the criminal investigation, and to ensure proper coordination before



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responding to the Complaint.

As indicated, on June 16, 2025, Plaintiff's counsel, Mr. Jeffrey M. Patti, Esq., consented to this request. Should the Court grant this request, the Defendants will answer, move or otherwise respond to the Complaint on or before July 23, 2025. I thank the Court for its attention to this matter.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: s/Marvin L. Freeman  
Marvin L. Freeman  
Deputy Attorney General

cc: **Via CM/ECF only**  
All counsel of record